

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: ANGEL L. VERA LAMBOY SSN 4882 Debtor	CASE NO. 21-03708 MCF CHAPTER 13 <i>Motion Requesting Extension of Time (30 days) to Commence Plan Payments doc #21</i>
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DSO OBJECTION TO EXTENDED TIME TO COMMENCE PAYMENT at doc #21

TO THE HONORABLE COURT:

COME NOW DSO Claimant Ileana Rodriguez Gonzalez through her legal representation and respectfully prays for the disallowance of doc #21 as requested:

1. The debtor filed his petition on December 16, 2021 under chapter 13. Refer to doc #1 and the §341 Meeting of Creditors was rescheduled to . January 19,2022.
2. Almost one month [29 days] after filing his bankruptcy petition, on January 14, 2022 at doc # 21 debtor filed his Plan and simultaneously requested an extension of 30 days in which to commence payment under the Plan, requesting a total of 59 days to commence payment after filing the petition under the 60-month Plan.
3. Debtor's request does not plead or show cause for such an extension of time.
4. The extension is to begin making payments approximately 59 days after filing the petition on December 16, 2022.
5. Debtor is employed as a Supervisor for General ALL Contractors Inc. and appears to have regular income as a Supervisor in the company.
6. DSO was being paid the DSO monthly obligation plus an additional amount as a payment plan to her which, although only \$100 monthly, at least helped her and her family make ends meet and survive.
7. DSO claimant, opposes any further time to commence making payments.
8. The delay is prejudicial to her and her children and more so if debtor pretends that his attorney receive his compensation prior to distribution to the two DSO claims and for the extended time and delay proposed under the Plan of 5 years.

WHEREFORE, Debtor respectfully requests that debtor be denied an extension of of 59 days in total to commence payments under his Plan as requested at doc #21.

NOTICE TO CREDITORS & PARTIES IN INTEREST

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (I) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF electronic noticing system that will send notifications, upon information and belief, of such filing to the Chapter 13 Trustee, the U.S. Trustee and to counsel for debtor Eduardo J Mayoral Garcia at emayoral@gmail.com.

In Hatillo Puerto Rico this January 25, 2022.

s/Melissa Cofán Hernández

Melissa Cofán Hernández

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Label Matrix for local noticing

0104-3

Case 21-03708-MCF13

District of Puerto Rico

Old San Juan

Wed Jan 26 09:53:43 AST 2022

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End of Label Matrix

Mailable recipients 14

Bypassed recipients 0

Total 14